
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

| | | |
|---------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | |
| | : | SUPERSEDING CRIMINAL |
| | : | COMPLAINT |
| | : | |
| v. | : | |
| | : | |
| JAKAI DENNIS, | : | Hon. Leda Dunn Wettre |
| a/k/a "Bop," | : | |
| ANGEL KEARNEY, | : | Mag. No. 21-13205 |
| a/k/a "Jim," | : | |
| a/k/a "Dred," | : | |
| THOMAS GIBSON | : | FILED UNDER SEAL |
| a/k/a "Tommy," | : | |
| JAMAR HALL, | : | |
| a/k/a "Goo," | : | |
| KASIM THURSTON, | : | |
| a/k/a "Kai," | : | |
| a/k/a "Kaz, | : | |
| IBN THURSTON, | : | |
| a/k/a "Wheezy," | : | |
| a/k/a "Saheed," | : | |
| ANTWAN WILLIAMS, | : | |
| a/k/a "Ant," a/k/a "Rue," | : | |
| KEVIN HALL, | : | |
| ANDRE FULLER, | : | |
| a/k/a "Draco," | : | |
| AKIM GIBSON, | : | |
| a/k/a "Ching," | : | |
| SHALAMAR McCALL, | : | |
| a/k/a "Shaggy, | : | |
| HAKIS MOSES, | : | |
| a/k/a "Hak, | : | |
| JALEEL DRAKE, | : | |
| a/k/a "Lil," | : | |
| a/k/a "SK," | : | |
| ELIJAH SHUMATE, | : | |
| a/k/a "Eli," | : | |
| a/k/a "E," and | : | |
| DAVID WILLIAMS | : | |


I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this criminal complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Michael Rutkowski
Special Agent
Federal Bureau of Investigation

Special Agent Rutkowski attested to this Complaint by telephone pursuant to F.R.C.P. 4.1

JUNE 29, 2021

DATE

DISTRICT OF NEW JERSEY

COUNTY AND STATE

Honorable Leda Dunn Wettre
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

Count One
(Continuing Criminal Enterprise)

From in or around July 2020 through in or around June 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

JAKAI DENNIS,
a/k/a "Bop,"

did knowingly and intentionally engage in a continuing criminal enterprise in that the defendant knowingly and intentionally violated Title 21, United States Code, Section 841(b)(1)(A), which violation includes, but is not limited to, the acts comprising the conspiracy alleged in Count Two, which acts were part of a continuing series of acts that constitute violations of that statute undertaken by the defendant in concert with five or more persons, with respect to whom the defendant occupied the position of organizer, supervisor, manager, and from which continuing series of violations the defendant obtained substantial income and resources.

In violation of Title 21, United States Code, Sections 848(a) and 848(c).

Count Two
(Conspiracy to Distribute Heroin and Crack Cocaine)

From at least as early as in or around July 2020 through in or around June 2021, in Essex County, in the District of New Jersey and elsewhere, the defendants

JAKAI DENNIS,
a/k/a "Bop,"
ANGEL KEARNEY,
a/k/a "Jim,"
a/k/a "Dred,"
THOMAS GIBSON,
a/k/a "Tommy,"
JAMAR HALL,
a/k/a "Goo,"
KASIM THURSTON,
a/k/a "KAI,"
a/k/a "KAZ,"
IBN THURSTON,
a/k/a "Wheezy,"
a/k/a "Saheed,"
ANTWAN WILLIAMS,
a/k/a "Ant,"
a/k/a "Rue,"
KEVIN HALL,
ANDRE FULLER,
a/k/a "Draco,"
AKIM GIBSON,
a/k/a "Ching,"
SHALAMAR McCALL
a/k/a "Shaggy,"
HAKIS MOSES,
a/k/a "Hak,"
JALEEL DRAKE,
a/k/a "Lil,"
a/k/a "SK,"
ELIJAH SHUMATE,
a/k/a "Eli,"
a/k/a "E," and
DAVID WILLIAMS,

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute one kilogram or more of a

mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and 280 grams or more of a mixture and substance containing a detectable amount of cocaine base (crack cocaine), a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

COUNT THREE
(Conspiracy to Possess Firearms in Furtherance of a Drug Trafficking Crime)

From at least as in or around July 2020 through in or around June 2021, in Essex County, in the District of New Jersey and elsewhere, the defendants,

JAKAI DENNIS,
a/k/a "Bop,"
ANGEL KEARNEY,
a/k/a "Jim,"
a/k/a "Dred,"
THOMAS GIBSON,
a/k/a "Tommy,"
JAMAR HALL,
a/k/a "Goo,"
KASIM THURSTON,
a/k/a "KAI,"
a/k/a "KAZ,"
IBN THURSTON,
a/k/a "Wheezy,"
a/k/a "Saheed,"
ANTWAN WILLIAMS,
a/k/a "Ant,"
a/k/a "Rue,"
KEVIN HALL,
ANDRE FULLER,
a/k/a "Draco,"
AKIM GIBSON,
a/k/a "Ching,"
SHALAMAR McCALL
a/k/a "Shaggy,"
HAKIS MOSES,
a/k/a "Hak,"
JALEEL DRAKE,
a/k/a "Lil,"
a/k/a "SK,"
ELIJAH SHUMATE,
a/k/a "Eli,"
a/k/a "E," and
DAVID WILLIAMS,

did knowingly and intentionally conspire and agree with each other and others to possess firearms in furtherance of a drug trafficking crime for which defendants may be prosecuted in a court of the United States, specifically the

conspiracy to distribute controlled substances as charged in Count Two of this complaint.

In violation of Title 18, United States Code, Section 924(o).

ATTACHMENT B

I, Michael Rutkowski, have been a Special Agent with the Federal Bureau of Investigation ("FBI") since 2009. I have been personally involved in the investigation of this matter. The information contained in this Criminal Complaint is based on my personal knowledge and information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information relating to the defendants; (c) my review of business records, other documents, and evidence obtained through court orders, subpoenas, and other sources; and (d) my review of audio and video recordings and photographs. Because this Criminal Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. All dates and times are approximate.

295 FAIRMOUNT AVENUE, NEWARK, NEW JERSEY

1. The location relevant to this Criminal Complaint is 295 Fairmount Avenue in Newark, New Jersey (hereinafter "295 Fairmount" or "the location"). The multi-family house is between 14th and 15th Avenues, but closer to 14th Avenue. A porch is at the base of the front door. The porch is accessible through a street-level steel door and several steps.

THE HEROIN DISTRIBUTION OPERATION AT 295 FAIRMOUNT

2. During the time relevant to the conspiracy as charged in Count Two of this Criminal Complaint, law enforcement has, at various times, surveilled the area in and around 295 Fairmount, viewed footage from cameras that had been installed across the street by law enforcement, conducted numerous recorded controlled purchases of heroin and crack cocaine by utilizing several Confidential Informants (CIs), reviewed arrests and drug seizures made by local law enforcement for drug distribution outside and in the vicinity of the location based on observations of police officers, received information from Confidential Sources (CSs), and reviewed telephone records showing interactions between the co-conspirators. From these various investigatory methods, law enforcement officers have determined that the defendants and others, working together, conspired to distribute large amounts of heroin and crack cocaine from the porch area in front of 295 Fairmount, from the street in front of the location, and from the vicinity of 295 Fairmount both before and during this investigation. Defendants used apartments inside the location to store drugs and guns to support the distribution operation. The defendants worked in "shifts" with more senior members getting the more coveted "morning shift" where more buyers would come through to purchase. Law enforcement officers have conducted recorded controlled purchases of heroin and crack cocaine from at least fourteen of the defendants, as set forth below, and local law enforcement has arrested another conspirator on more

than one occasion at the location following observations of hand-to-hand drug transactions.

3. DAVID WILLIAMS is the super of the building who, with full knowledge of the drug distribution scheme, aided the conspirators by storing guns and drugs in his apartment inside Fairmount Avenue and doing other tasks in furtherance of the drug distribution. In total, approximately 34 controlled purchases of heroin and/or crack cocaine were completed using confidential informants.

4. During the period relevant to Count Two of this Criminal Complaint, the location usually operated the drug distribution business between approximately 6:00 am until late in the evening. Numerous "buyers" who appear to be addicts, were observed approaching the front of the building either on foot or in vehicles. A pole camera was active across the street and recorded many hundreds of transactions between the conspirators and the buyers. The heroin sold was high in quality and thus attracted regular buyers. The heroin was controlled by JAKAI DENNIS, a/k/a "Bop," ("DENNIS") who packaged certain of the "brands" himself and obtained pre-packaged heroin from other sources. The defendants sold mostly the same "brands" of heroin throughout the conspiracy period which were stamped onto the glassine envelopes that contained the heroin, thus allowing buyers to identify and purchase the brands that they preferred.

5. The investigation revealed that the defendants worked together to distribute the heroin and crack cocaine which was supplied primarily by DENNIS. For example, telephone records show hundreds of contacts between the conspirators, DENNIS coordinated the supply of heroin, the same four or five brands were distributed consistently during the conspiracy, and conspirators would refer buyers to other conspirators if they were out of product or did not have enough supply to fulfill the buyer's order. In addition, the defendants were frequently observed standing together waiting for buyers to approach, and sometimes worked in concert to complete drug transactions. The defendants worked in assigned shifts and profited from their combined efforts, making large amounts of money from the heroin and crack cocaine they distributed. As described in detail below, the conspirators had access to firearms kept at 295 Fairmount or at other locations that DENNIS controlled, which the defendants commonly used to protect their drug business from being robbed and protect against anyone who threatened the conspirators. The defendants had a gun supplier who would bring illegal firearms from North Carolina to New Jersey and sell those firearms to the defendants.

6. As set forth below, the investigation has revealed that the defendants acted in concert to control the area in and around 295 Fairmount Avenue and that the drug distribution was coordinated among the conspirators.

JAKAI DENNIS'S CONTROL OVER THE DRUG OPERATION

7. DENNIS has been the main supplier to the conspirators of the heroin and crack cocaine distributed from 295 Fairmount during the conspiracy period. DENNIS would distribute the heroin and crack cocaine and then have the money from the hand-to-hand transactions picked up for delivery back to him or would collect the drug proceeds himself. A Confidential Source (CS-1)¹ has informed law enforcement that DENNIS and other conspirators used drug money to purchase vehicles that would be registered in the name of female associates to hide their true ownership. Several of these vehicles had specially installed "traps" or hidden compartments, in which DENNIS and other conspirators would transport drugs, guns and money. CS-1 stated that these vehicles were used by DENNIS and other conspirators in furtherance of the drug trafficking. DENNIS also used drug proceeds to set up "legitimate businesses" in and around Newark, including a beauty supply shop and a laundromat.

8. CS-1 detailed the amounts of heroin and crack that DENNIS and the co-conspirators distributed at Fairmount Avenue during the conspiracy period. CS-1 stated that hundreds of bricks per week would be distributed at Fairmount and that DENNIS made on average of \$30,000 to \$50,000 per month in profit on all of his illegal drug distribution. This is corroborated by seizures in the investigation of crack and heroin in and around Fairmount, pole camera footage showing numerous drug transactions each day over the course of the conspiracy, and controlled buys of heroin and crack.

9. In total, based on all the available evidence, the defendants distributed in excess of one kilogram of heroin and over 280 grams of crack cocaine during the conspiracy period.

¹ CS-1 is corroborated by seizures of firearms, drugs and money as described below. Additionally, CS-1's information in the past has been corroborated by independent investigative techniques and information CS-1 has told law enforcement that has been shown by independent evidence to be accurate. For example, CS-1's information has been fully corroborated by public records for the vehicles, observations by law enforcement of the vehicles being used for drug transactions and being present at the location during drug transactions, pole camera footage, and other independent sources. Accordingly, law enforcement has deemed CS-1 to be reliable.

10. CS-1 also told law enforcement about firearms DENNIS kept as “community guns” for use by the defendants in protecting the drug operation at Fairmount.

FURTHER CONFIDENTIAL SOURCE INFORMATION

11. CS-1’s information regarding the drug conspiracy is corroborated by a second Confidential Source (“CS-2”). CS-2² is familiar with the activities at 295 Fairmount Avenue. CS-2 has observed many of the conspirators engaged in drug transactions during the conspiracy period. CS-2 described specific areas of 295 Fairmount Avenue, including an empty apartment on the second floor that the conspirators used to store drugs and guns in furtherance of the drug distribution conspiracy. Upon learning of this information, the FBI installed a hidden camera inside the second floor stash apartment. Those recordings show conspirators going in and out of the apartment during the conspiracy period. CS-2 has also provided information about DAVID WILLIAMS and his involvement with the drug distribution activities at 295 Fairmount.

SEIZURES OF HEROIN AND CRACK COCAINE³

A. July 28, 2020 Seizure

12. On or about July 28, 2020, law enforcement officers with the Newark Police Department (“NPD”) dressed in civilian attire and utilizing binoculars were conducting proactive enforcement efforts near 295 Fairmount. While conducting their patrol, officers observed DENNIS in front of 295 Fairmount. DENNIS was approached by a female who had what appeared to be United States currency in her right hand, which she provided to DENNIS. DENNIS then began to look in various directions, appearing to look for any unusual activity or possible police presence in the area.

13. Believing that DENNIS had done a hand-to-hand narcotics transaction, continued observation of DENNIS was maintained. DENNIS was

² CS-2’s information is corroborated by recorded conversations during the controlled buys, an undercover camera installed in the conspirators’ second-floor stash apartment, and other sources. CS-2 is not charged in connection to the drug conspiracy but has received compensation for relocation and other expenses.

³ Lab reports for some of the seized and purchased heroin and cocaine have been returned showing the substances are in fact heroin or cocaine base (crack cocaine). Other seized drugs are pending lab results but based on the investigation to date, the packaging and the appearance of the substances contained therein, and the circumstances of the various seizures, there is probable cause to believe the substances seized in fact contain heroin and crack cocaine.

subsequently observed approaching the driver's side of a silver Jeep Grand Cherokee that had double parked on Fairmont Avenue. The driver of the Jeep, Naim Copeland ("Copeland"),⁴ lowered the driver side window and exchanged handshakes and began to engage DENNIS in conversation. During the course of their conversation DENNIS began to look in various directions and leaned into the driver-side window area. Copeland displayed a black plastic bag, untied the handles, and removed from within the bag a clear plastic bag containing a white block form substance which he displayed to DENNIS, who momentarily grabbed it, inspected it and handed it back to Copeland. Copeland then removed a second clear plastic bag from within the same black plastic bag and displayed it to DENNIS. That bag also appeared to contain additional white substances, which, based on numerous narcotics arrests in the past, were believed to be cocaine or crack cocaine.

14. Copeland was removed from the vehicle and detectives secured the previously observed black plastic bag which contained three clear plastic bags containing approximately 250 grams of crack cocaine.

15. While officers dealt with Copeland, another officer stopped DENNIS. A search of DENNIS's waist area revealed a clear plastic bag containing approximately 26 jugs of suspected crack cocaine along with approximately 28 small bundles of individual glassine envelopes containing suspected heroin stamped with the brand name "Kevin Hart LOL."

B. July 21, 2020 Seizure

16. On July 21, 2020, Newark police officers observed HAKIS MOSES, a/k/a "Hak" ("MOSES") engage in what appeared to be a hand-to-hand drug transaction in front of 295 Fairmount. Upon moving in to arrest MOSES, officers recovered approximately 29 glassine envelopes containing heroin, including five stamped with the brand name "Tom & Jerry."

C. November 24, 2020 Seizure

17. On November 24, 2020 Newark police officers observed ELIJAH SHUMATE, a/k/a "Eli," a/k/a "E" ("SHUMATE") and other conspirators congregating on and around the front porch of 295 Fairmount. As officers approached, they noticed numerous rubber bands on the ground, indicating packaging for bundles of heroin. Officers observed a clear plastic bag protruding from SHUMATE's waistband, which appeared to contain heroin. SHUMATE, who was sitting on the porch was arrested and officers recovered approximately 184 glassine envelopes of heroin inside the clear bag marked

⁴ Copeland and DENNIS were separately charged for this incident under a Criminal Complaint filed on or about May 19, 2021 under Mag. No. 21-10209. This Criminal Complaint supersedes that charge as to DENNIS only.

with the following brand name stamps: “Tom and Jerry” (93), “Dunkin’ Donuts” (48), and “Netflix” (43).

D. March 6, 2021 Seizure

18. On March 6, 2021, Newark police observed an individual approach the driver’s window of a vehicle parked at 325 Fairmount Avenue. DENNIS was driving that vehicle and officers observed the individual hand DENNIS what appeared to be U.S. Currency. DENNIS then gave the individual an object from a clear plastic bag. After police stopped DENNIS’s vehicle as it moved away from the scene, a search of DENNIS revealed a plastic bag in his waistband which contained approximately 26 glassines of heroin stamped with the brand name “Tretcha Nose” and 42 glassines of heroin stamped with the brand name “Smoking,” as well as 65 vials containing crack cocaine. DENNIS also had \$773.00 in drug proceeds.

E. March 19, 2021 Seizure

19. On March 19, 2021, Newark police observed JAMAR HALL in front of 295 Fairmount. Hall was approached by an individual who gave JAMAR HALL money in exchange for an item JAMAR HALL took out of a clear plastic bag. A second hand-to-hand transaction in the same manner was observed before police moved in to arrest JAMAR HALL. Upon approaching JAMAR HALL, police recovered from JAMAR HALL’s waistband a clear plastic bag containing 72 glassines of heroin, including 29 stamped with the brand name “Tom & Jerry” and 18 vials of crack cocaine.

F. April 13, 2021 Seizure

20. On April 13, 2021, Newark police observed THOMAS GIBSON, a/k/a “Tommy” (“THOMAS GIBSON”) walk to a vehicle that had pulled up to THOMAS GIBSON at the corner of Camden Street and 15th Avenue (about a block from 295 Fairmount).⁵ The passenger in the vehicle handed THOMAS GIBSON money, and THOMAS GIBSON handed the passenger an object. THOMAS GIBSON then did a second hand-to-hand transaction with the driver of another vehicle that approached him. THOMAS GIBSON was observed with a black plastic bag in his hand from which he took an object and gave it to the driver. THOMAS GIBSON then was observed going to a nearby parking lot and placing items in the trunk of a vehicle. THOMAS GIBSON then drove off but upon officers stopping his vehicle, police recovered 136 glassines of heroin from

⁵ Many of the defendants began selling drugs along Camden Street after a shooting incident took place at or near 295 Fairmount Avenue (as described below) on March 26, 2021, since there was a greater police presence at the location because of the shooting for several weeks. Eventually, the defendants returned to their usual drug distribution activity in front of 295 Fairmount.

inside the vehicle stamped "Tom & Jerry" along with over \$1,300 of suspected drug proceeds.

G. Drug Seizures from KEVIN HALL

21. KEVIN HALL was arrested by local law enforcement four times between October 8, 2020 and May 30, 2021 for distributing heroin and crack cocaine in front of 295 Fairmount.

October 8, 2020 Seizure

22. On October 8, 2020, members of the Essex County Sheriff's Office Bureau of Narcotics observed KEVIN HALL outside of 296 Fairmount Avenue (across the street from 295 Fairmount Avenue) with other individuals. An individual approached KEVIN HALL, at which time KEVIN HALL took out an object from his waistband and handed it to the individual, who then gave KEVIN HALL money. Upon approaching KEVIN HALL, officers recovered 30 glassines of heroin stamped "Tom & Jerry" and 33 vials of crack cocaine.

December 8, 2020 Seizure

23. On December 8, 2020, members of the Essex County Sheriff's Office Bureau of Narcotics observed KEVIN HALL, in front of 282 Fairmount Avenue, which is across the street from 295 Fairmount. HALL was standing with SHUMATE and Shalamar McCALL, a/k/a/ "Shaggy" (McCALL) when police observed what appeared to be a hand-to-hand drug transaction between KEVIN HALL and a buyer who rode up on a bicycle. After officers moved in to arrest KEVIN HALL, officers recovered 20 vials containing crack cocaine and approximately three glassine envelopes of heroin stamped with the brand name "Tom & Jerry." McCALL had a large amount of United States Currency in his possession.

May 8, 2021

24. On May 8, 2021, KEVIN HALL was observed by Newark police driving a 2003 Buick Regal which pulled up next to a second vehicle in front of 277 Fairmount Avenue. The occupant of the second vehicle handed KEVIN HALL a clear bag, and KEVIN HALL then drove down Fairmount and parked near 14th Avenue. A short time later, a man riding a bicycle came to the driver's window and appeared to hand KEVIN HALL money, at which time KEVIN HALL handed the man an item from the clear plastic bag. Upon stopping KEVIN HALL's vehicle, police recovered the clear plastic bag from KEVIN HALL and that bag contained 90 glassines of heroin stamped with the brand name "Tom & Jerry."

May 30, 2021 Seizure

25. On May 30, 2021, Newark police observed KEVIN HALL driving the same 2003 Buick Regal in the area of South 8th Street. Officers observed an individual approach the Buick and engage in conversation with KEVIN HALL. The individual handed KEVIN HALL what appeared to be money. KEVIN HALL then gave the individual an object from a clear plastic bag. Upon approaching KEVIN HALL, officers recovered 90 glassines of heroin, 87 of which were stamped with the brand name "NBA."

H. May 13, 2021 Seizure

26. On May 13, 2021, members of the Essex County Prosecutor's Office ("ECPO") executed a search warrant at the Newark home of DENNIS's aunt. Among the items found was approximately 339 vials containing crack cocaine. As described below, the crack cocaine was controlled by DENNIS.

I. June 14, 2021 Seizure

27. On June 14, 2021, the FBI, pursuant to a court-authorized search warrant, recovered 41 vials containing crack cocaine from an Infiniti vehicle used by DENNIS. The investigation revealed that at least six different vehicles have been registered to DENNIS's or other defendants' girlfriends in order to disguise the true user of the vehicle. Additionally, the FBI has observed drug transactions on several occasions being conducted from vehicles utilized by the defendants at or around Fairmount Avenue.

28. CS-2 has stated that several vehicles DENNIS used have "traps" within them. A trap is a hidden compartment used to store guns or drugs. CS-2 reported that the Infiniti had such a trap located in the back of the center console that DENNIS has used to hide illegal drugs. The 41 vials of crack were hidden in the center console behind a panel that was loose so that the drugs could be easily concealed.

CONTROLLED BUYS OF HEROIN AND CRACK COCAINE

29. In addition to the seizures as a result of local law enforcement arrests as described above, between October 2020 and June 2021, the FBI conducted controlled buys from the conspirators. All of these buys, unless otherwise noted, were conducted in front of, or in the vicinity of, 295 Fairmount. A few times, CIs posing as buyers were directed to different locations by the conspirator. The FBI utilized more than one confidential informant for these purchases. Prior to each controlled buy, law enforcement officers outfitted the CI being utilized with an audio-video recording device, provided that CI with United States currency with which to purchase heroin,

and ensured that the CI did not have any unauthorized contraband or currency.

| Buy No. | Date | Defendant | Amount Purchased | Brand of Heroin |
|---------|----------|------------------------------|---------------------------------------|---|
| 1 | 10/28/20 | HAKIS MOSES | Heroin: 29 glassines | Tom and Jerry ("TJ"); Dunkin Donuts ("DD"); 007 |
| 2 | 11/3/20 | JALEEL DRAKE SHUMATE | Heroin: 30 glassines; Crack: 10 vials | Covid-19 |
| 3 | 11/5/20 | SHUMATE | Heroin: 20 glassines; Crack: 10 vials | TJ; DD |
| 4 | 11/9/20 | MOSES; SHUMATE | Heroin: 44 glassines; Crack: 10 vials | DD; KFC, Take Off |
| 5 | 11/10/20 | SHUMATE | Heroin: 50 glassines; Crack: 10 vials | DD |
| 6 | 11/16/20 | SHUMATE | Heroin: 50 glassines; Crack: 10 vials | DD |
| 8 | 12/1/20 | THOMAS GIBSON | Heroin: 39 glassines | Black Sunday |
| 9 | 12/3/20 | DRAKE | Heroin: 50 glassines | TJ |
| 10 | 12/8/20 | IBN THURSTON ANTWAN WILLIAMS | Heroin: 50 glassines | TJ |
| 11 | 12/10/20 | SHUMATE | 1 brick (49 glassines) | TJ, DD |
| 12 | 12/15/20 | Unknown Individual | Heroin: 10 glassines; Crack: 7 vials | TJ |
| 13 | 12/29/20 | IBN THURSTON ANTWAN WILLIAMS | Heroin: 50 glassines | TJ, Black Sunday |

| | | | | |
|-----|---------|---------------------------------|--|---------------------------|
| 14 | 1/7/21 | SHALAMAR McCALL | Heroin: 20 glassines; Crack: 6 vials | TJ |
| 15 | 1/12/21 | McCALL | Heroin: 30 glassines; Crack: 7 vials | TJ |
| 16 | 1/21/21 | SHUMATE | Heroin: 38 glassines | TJ |
| 17 | 1/28/21 | FULLER | Heroin: 50 glassines | TJ, Treatcha Nose |
| 18 | 2/5/20 | AKIM GIBSON | Heroin: 50 glassines | TJ |
| 19 | 2/10/21 | AKIM GIBSON; KASIM THURSTON; | Heroin: 50 glassines | TJ, DD |
| 20 | 2/17/21 | SHUMATE | Heroin: 50 glassines; Crack: 5 vials | TJ; Netflix |
| 21 | 2/23/21 | FULLER; JAKAI DENNIS | Heroin: 50 glassines; Crack: 4 vials | TJ; Smoking |
| 22 | 2/25/21 | THOMAS GIBSON; FULLER | Heroin: 51 glassines; Crack: 4 vials | TJ; Blue Thumps Up, Purge |
| 23 | 3/1/21 | DENNIS | Heroin: 100 glassines; Crack: 3 vials | Smoking |
| 24 | 3/4/21 | AKIM GIBSON; FULLER | Heroin: 100 glassines | Smoking |
| 25 | 3/17/21 | KASIM THURSTON | Heroin: 148 glassines; Crack: 1 vial | TJ; Mike Epps |
| 26 | 3/22/21 | DENNIS | Heroin: 50 glassines | TJ |
| 27* | 4/20/21 | THOMAS GIBSON | Heroin: 50 glassines | TJ |
| 28 | 4/27/21 | THOMAS GIBSON | Heroin: 50 glassines | NBA |
| 29 | 5/4/21 | JAMAR HALL ANGEL KEARNEY | Heroin: 50 glassines | TJ |
| 30 | 5/12/21 | JAMAR HALL | Heroin: 50 glassines | TJ; NBA; Batman |

| | | | | |
|------|---------|---------|-----------------------|-----------------|
| 31 | 5/19/21 | KEARNEY | Heroin: 45 glassines | TJ; Batman |
| 32 | 5/25/21 | DRAKE | Heroin: 20 glassines | TJ; Batman; NBA |
| 33** | 5/26/21 | KEARNEY | Heroin: 100 glassines | NBA |
| 34 | 6/3/21 | KEARNEY | Heroin: 100 glassines | NBA |

*This transaction was conducted in Newark but not in the vicinity of Fairmount Avenue because THOMAS GIBSON told the CI during a recorded telephone conversation to meet him in a different location.

** This transaction was conducted in Newark but not in the vicinity of Fairmount Avenue because ANGEL KEARNEY told the CI during a recorded telephone conversation to meet him in a different location.

POLE CAMERAS

30. During the conspiracy period, the FBI monitored the front of 295 Fairmount using two cameras which recorded in real time. Those cameras were secretly installed across the street from the location on utility poles. The first camera was installed on or about November 24, 2020. The second was installed on or about January 8, 2021.

31. At various times during these recordings, the FBI observed:

- Hundreds of drug transactions involving the defendants and buyers who would approach the front of 295 Fairmount Avenue;
- Hundreds of daily interactions showing the defendants congregating in front of 295 Fairmount Avenue. Defendants arriving for their drug “shifts” utilizing different vehicles; The drug distribution would regularly start at approximately 5:30 to 6:00 am, and defendants would work different shifts. The drug distribution would usually run through the day into the evening hours.
- A daily constant stream of buyers approaching on foot, by vehicle and by bicycle, and the defendants doing hand-to-hand drug transactions in exchange for money;
- Defendants holding, counting, and passing amongst themselves large amounts of drug proceeds;
- Defendants would regularly store drugs and money inside the waistband or crotch area of their pants in order to avoid police detection;

USE OF APARTMENT WITHIN 295 FAIRMOUNT AVENUE

32. On or about April 2, 2021, the FBI installed a hidden camera inside an abandoned apartment on the second floor of 295 Fairmount that the defendants had access to. CS-2 stated that the defendants used to store drugs with the aid of the super, DAVID WILLIAMS, who held keys to the abandoned apartment.

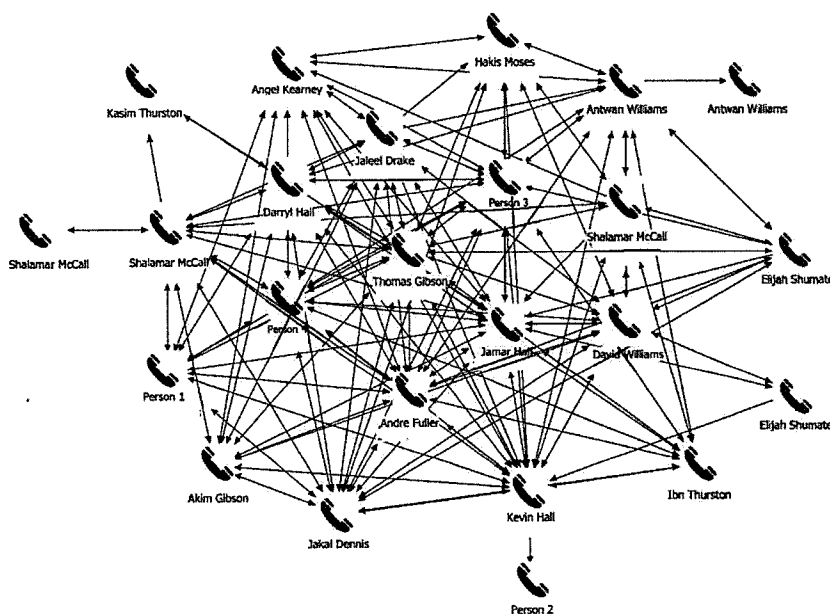
33. Video footage shows certain individuals, including THOMAS GIBSON, among others, inside the second-floor apartment. GIBSON can be seen with what appears to be drugs inside the apartment. The super, DAVID WILLIAMS, also can be seen entering the apartment.

34. The use of this apartment is corroborated by one of the controlled buys described above. Specifically, on March 1, 2021, the CI purchased heroin from DENNIS. During the transaction, DENNIS went inside the location and up the stairs to the second floor landing, then called down to THOMAS GIBSON, and asked THOMAS GIBSON for the keys, before proceeding inside to get the heroin and crack cocaine before returning to hand the CI the drugs.

35. CS-2 confirmed that the defendants used the second floor apartment to store drugs and guns in addition to using the apartment of the location's super, defendant DAVID WILLIAMS.

PHONE CONNECTIONS

36. Many of the defendants gave out their phone numbers to the FBI CIs to use to contact them for future drug transactions. Using these telephone numbers and telephone numbers obtained from other sources, records show hundreds of calls between nearly all of the defendants during the conspiracy period. The following chart shows these telephone connections. Each arrow represents existing telephone contacts between the defendants during the time period of the conspiracy.



37. Examples of the number of telephone connections include:

- DENNIS and FULLER shared 335 events from October 3, 2020 to January 19, 2021.
- DENNIS and THOMAS GIBSON shared 290 total events from October 1, 2020 to December 9, 2020.
- DENNIS and JAMAR HALL shared 192 events from October 5, 2020 to February 13, 2021.
- DENNIS and KEVIN HALL shared 80 events from October 5, 2020 to January 19, 2021.
- DENNIS and DRAKE shared 32 events from December 17, 2020 to January 23, 2021.
- KEARNEY and THOMAS GIBSON shared 38 events from October 2, 2020 to December 16, 2020.
- KEARNEY and JAMAR HALL shared 32 events from October 18, 2020 to February 5, 2021.
- KEARNEY and AKIM GIBSON shared 20 events from January 18, 2021 to January 29, 2021.
- KEARNEY and FULLER shared 14 events from December 10, 2020 to January 19, 2021.
- ANTWAN WILLIAMS and MOSES shared 103 events from October 7, 2020 through November 28, 2020.

- ANTWAN WILLIAMS and KEVIN HALL shared 50 total events (13 outgoing and 37 incoming) from February 2, 2021 through February 12, 2021.
- ANTWAN WILLIAMS and FULLER shared 154 events (80 outgoing and 74 incoming) between November 20, 2020 and January 19, 2021.
- FULLER and JAMAR HALL shared 169 events (128 outgoing and 44 incoming) between November 7, 2020 and January 3, 2021.
- FULLER and KEVIN HALL shared 50 events (13 outgoing and 37 incoming) between February 2, 2021 and February 12, 2021.
- FULLER and DRAKE shared 24 events (12 outgoing and 12 incoming) between December 14, 2020 and January 19, 2021.
- FULLER and THOMAS GIBSON shared 37 events (25 incoming and 12 outgoing) between November 8, 2020 and December 7, 2020.
- DRAKE and KEARNEY shared 39 events (16 outgoing and 23 incoming) from December 15, 2020 to June 16, 2021.

DAVID WILLIAMS

38. DAVID WILLIAMS was the super of 295 Fairmount Avenue responsible for maintenance in the building. He also resides in the building. The defendants also employed DAVID WILLIAMS to aid in their drug conspiracy through various means. CS-1 and CS-2 both describe DAVID WILLIAMS as getting paid money and being given free heroin in exchange for the use of his apartment to store guns and drugs and for DAVID WILLIAMS to allow the defendants to use the second floor abandoned apartment to aid them in storing drugs.

39. DAVID WILLIAMS, during a recorded conversation on or about May 3, 2021, stated that certain individuals were working that day and had heroin available; he mentioned locking the "door upstairs" for "Tom" that morning and that "Tom" came in through the back door. I believe based on the investigation that DAVID WILLIAMS was referencing locking up the stash apartment on the second floor for THOMAS GIBSON. This is corroborated by pole camera observations showing that THOMAS GIBSON is the defendant who arrives early in the morning, usually between 5:30 and 6:00 a.m. to set up the day's drug business and CS-1 who stated that DAVID WILLIAMS holds keys to the apartment for the defendants.

40. During the recorded conversation on May 3, 2021 DAVID WILLIAMS also mentions to an individual that the available brands of heroin that day were "Tom & Jerry" and "NBA."

41. DAVID WILLIAMS also discussed the shooting in front of Fairmount Avenue that occurred on March 26, 2021 (described in detail below) between KASIM THURSTON and an individual known on the street as "Man-

Man.” DAVID WILLIAMS stated “Man-Man messed up the block to ruin business.”

42. Though none of the defendants live at 295 Fairmount, DAVID WILLIAMS had numerous telephone contacts with SHUMATE, IBN THURSTON, McCALL, FULLER, KEVIN HALL, DENNIS, JAMAR HALL, THOMAS GIBSON, and DRAKE.

GUN CONSPIRACY

43. CS-1 and CS-2 have observed several of the defendants carry guns during the time period of the conspiracy. CS-1 stated that the Fairmount defendants kept guns available in 295 Fairmount to protect the drug business from anyone who might challenge or rob the group. The Fairmount defendants had a gun supplier based in North Carolina who supplied the defendants with guns for this purpose and who was himself shot and killed on March 26, 2021 during a shootout involving KASIM THURSTON and another individual in front of 295 Fairmount Avenue, as described below.

A. March 26, 2021 Shooting

44. On or about March 26, 2021, at approximately 9:00 p.m., law enforcement responded to a report that shots were fired in the vicinity of 297 Fairmount Avenue in Newark, New Jersey.

45. Video footage from various cameras in the area captured the shooting and the events that followed from multiple vantage points, which collectively depicts the following sequence of events:

- At approximately 7:32 p.m., a person known as “Man-Man” came onto the scene and engaged with some of the defendants in front of 295 Fairmount. A dispute broke out a short time later and Man-Man left the dice game and entered a vehicle, which drove away. Approximately 35 minutes later, at about 8:48 p.m., Man-Man came back to 295 Fairmount and emerged from a vehicle that had parked at the scene.
- Moments later, Man-Man rejoined the group of dice players on the sidewalk and began a physical altercation with at least one individual. Man-Man then walked to the passenger side of the vehicle he came in and reached inside. As he reached into the vehicle and began to turn back to the individuals on the sidewalk, KASIM THURSTON, who was in possession of a handgun, fired multiple shots at Man-Man, striking him in the right arm. Man-Man then fell to the ground, with a handgun visible in his hand, and got up to take cover behind a vehicle. Additional shots were then fired back towards KASIM THURSTON, who was on the sidewalk, from where Man-Man was

standing. In the process, the Fairmount defendants' gun supplier from North Carolina, who had brought DENNIS firearms and was in New Jersey from North Carolina, was shot and killed.

B. May 4, 2021 Gun Seizure

46. On or about May 4, 2021, CS-2 informed the FBI that CS-2 was aware of an incident where a juvenile associate of the Fairmount defendants dropped off a firearm for an individual to hold on behalf of JAMAR HALL. That firearm, a loaded .40 caliber Taurus handgun bearing serial number TC028853, was eventually recovered by the FBI. According to CS-2, JAMAR HALL was told that the gun was sold and JAMAR HALL was provided with the proceeds. JAMAR HALL took the money and gave the individual who purportedly sold the gun \$50 as a commission for selling the firearm. JAMAR HALL originally stated that the firearm was his, but then stated the firearm belonged to the Fairmount Avenue defendants. JAMAR HALL stated the Fairmount defendants had other weapons available and that he could buy additional firearms if needed.

C. May 13, 2021 Gun and Drug Seizure

47. On or about May 13, 2021, members of the Essex County Prosecutor's Office ("ECPO") executed a search warrant at the Newark home of DENNIS's aunt. That search warrant was based upon information from a CS-1 who described the location inside DENNIS's aunt's home where DENNIS stored firearms and drug money.

48. Upon executing the search warrant, ECPO detectives recovered a backpack containing approximately \$5,500 dollars in U.S. currency of suspected drug proceeds, drug paraphernalia (packaging materials), and approximately 339 vials of suspected crack cocaine.

49. Also recovered next to the backpack containing the money and crack cocaine were two handguns in plastic bags: a .45 caliber handgun, bearing serial number GI128413, loaded with five rounds of .45 caliber ammunition, and a 9mm handgun, bearing serial number F12502, loaded with 33 rounds of ammunition in an extended magazine.⁶

50. Also inside the backpack were photos of DENNIS together with a group of individuals, including JAMAR HALL, DENNIS, KEARNEY and ANTWAN WILLIAMS.

⁶ A third firearm, an unloaded pink 9mm handgun, bearing serial number 509050, was found nearby in the same bedroom. DENNIS's aunt claimed that firearm was hers and in fact that firearm was registered to DENNIS's aunt.

51. CS-2 stated that the North Carolina gun supplier who was killed on March 26, 2021 had supplied the Firearms to DENNIS and that they were used by various members of the group.

May 26, 2021 – KEARNEY Observed With Firearm

52. During the controlled buy of heroin from KEARNEY as described above on May 26, 2021, the CI approached KEARNEY, who was sitting in the driver's seat of a parked vehicle. As the CI was waiting for KEARNEY to retrieve the heroin, the CI observed a handgun inside the vehicle as KEARNEY reached into a plastic bag to retrieve the heroin he sold to the CI.